

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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	:	
Easter Unlimited, Inc. d/b/a Fun World,	:	No. 18 Civ. 6637-JFB-ARL
	:	
Plaintiff,	:	
	:	
-against-	:	<b>NOTICE OF MOTION</b>
	:	
Terry Rozier,	:	
	:	
Defendant.	:	
-----	X	

**PLEASE TAKE NOTICE** that Defendant Terry Rozier, upon the accompanying Memorandum of Law, Declaration of Terry Rozier, Declaration of Tony Gardner, and Declaration of Patrick S. Kabat, and accompanying exhibits, and all prior pleadings and proceedings hereto, by their undersigned attorneys, hereby respectfully move this Court, before the Honorable Roslynn R. Mauskopf, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Courtroom 6A (South Wing), Brooklyn, NY 11201, for an order granting summary judgment to Rozier, pursuant to Federal Rule of Civil Procedure 56, on all claims asserted by Plaintiff Easter Unlimited, Inc. d/b/a Fun World, and for such other and further relief as the Court may deem just and appropriate.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff's answering papers must be served in accordance with the August 21, 2020 deadline set by the Court.

Dated: July 31, 2020

Respectfully submitted,

/s/ Patrick S. Kabat

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*Counsel for Defendant Terry Rozier*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31st day of July 2020, I directed that a true and correct copy of the foregoing **NOTICE OF MOTION**, together with all supporting papers, be served by email and First Class Mail upon the following counsel of record:

Craig B. Sanders  
Erica Carvajal  
Jonathan M. Cader  
Barshay Sanders PLLC  
100 Garden City Plaza, Suite 500  
Garden City, NY 11530

*Attorneys for Plaintiffs*

I further certify that, once the motion is fully briefed, a true and correct copy of these documents shall be filed with the Court through the electronic filing system, which will automatically serve electronic notice of the same on all counsel of record.

/s/ Patrick S. Kabat

Patrick S. Kabat